



OFFICE OF THE DISTRICT ATTORNEY
RICHMOND COUNTY

January 10, 2020

With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosure: the People are aware that during the time he has been employed by the New York City Police Department, Police Officer Timothy Chi has been named as a defendant or co-defendant in a federal civil lawsuit.

On a prior date, the People performed a simple name search of the Public Access to Court Electronic Records ["PACER"] website, and found the following case which lists this member of law enforcement as a civil defendant together with the "City of New York" in cases in the Eastern or Southern Districts of New York:

1. *Camejo, v. City of New York, et. al.*, 19-cv-4142, settled in 2013 for an undisclosed amount in the Eastern District of New York, without any finding of fault or liability.

In this case that settled, a stipulation of settlement and order of dismissal was filed with the respective court, indicating, in sum and substance, that nothing in the settlement shall be construed as an admission or concession of liability by any of the defendants or the City of New York regarding any of the allegations made by the plaintiffs in their complaints, or that any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated. Moreover, it appears that any sums paid to the plaintiff as a result of this settlement were paid solely by the City of New York, without contribution from this member of law enforcement.

Further, the People have reviewed the New York City Police Department Central Personnel Index ["CPI"] of Police Officer Timothy Chi, which revealed the subject officer's disciplinary history, and which consists of one substantiated case:

1. In 2019, Police Officer Timothy Chi received a Schedule A command discipline for failing to safeguard department equipment, namely, a department cellular phone, and for the loss of said equipment.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at [REDACTED] during office hours.

Sincerely,